

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

UNITED STATES OF AMERICA,

**Case No. 23-80101-CR  
CANNON/REINHART**

vs.

DONALD J. TRUMP,  
WALTINE NAUTA, and  
CARLOS DE OLIVEIRA,

Defendants.

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**PRESIDENT DONALD J. TRUMP'S CONSENT MOTION FOR  
LEAVE TO FILE OVERSIZED BRIEF**

President Donald J. Trump respectfully submits this motion for leave to file an oversized brief in support of his motions to compel discovery from the Special Counsel's Office.<sup>1</sup>

Pursuant to the Court's November 10, 2023 Order (Dkt. 215), on January 16, 2024, President Trump intends to file at least six motions to compel different types of discovery from the Special Counsel's Office, including a motion for an order regarding the scope of the prosecution team and motions for disclosures relating to security clearances, secure facilities at President Trump's residences, the national defense information element under 18 U.S.C. 793(e), tracking information relating to the handling of allegedly classified documents, damage assessments, and impeachment material relating to the conduct of the investigation. President Trump intends to file separate unclassified and classified briefs relating to these motions.

The Local Rules would permit a total of 120 pages of briefing in support of six motions. President Trump expects that filing one consolidated classified brief and one consolidated

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<sup>1</sup> Defendants Waltine Nauta and Carlos De Oliveira join in this motion. President Trump's counsel has conferred with the Special Counsel's Office, and the Office consents to the relief requested herein, and asks that the Court permit the Office to file oversized briefs up to the number of pages filed by President Trump. President Trump consents to this request.

unclassified brief will be more efficient for the parties and the Court when considering the various motions. While President Trump anticipates the consolidated briefs will be under the aggregated page limit, we do anticipate it will be more than the 20 pages allowed under the Local Rules for a single motion.

For these reasons, we respectfully request that the Court grant leave for the Parties to file separate unclassified and classified briefs not to exceed 120 pages combined.

Dated: January 12, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Christopher M. Kise, certify that on January 12, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

*/s/ Christopher M. Kise*  
Christopher M. Kise